

1 Honorable Richard A. Jones  
2  
3  
4  
5  
6

7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT SEATTLE

10 ELISABETH REHN, an individual,

11 Plaintiff,

No. 2:23-cv-01609-RAJ

12 vs.

13 CITY OF SEATTLE, a lawful  
14 municipal corporation in the State of  
Washington; RILEY CAULFIELD;  
YOUNGHUN KIM; SETH WAGNER;  
JOHN DUUS; AND JASON  
DRUMMOND,

15 Defendants.

**NOTICE OF CIVIL INTERLOCUTORY  
APPEAL**

16 Notice is hereby given that Defendants City of Seattle, Riley Caulfield, Younghun Kim, and  
17 Seth Wagner<sup>1</sup>, appeal to the United States Court of Appeals for the Ninth Circuit from Order on  
18 Motion for Summary Judgement, Docket No. 56 entered in this action on July 1, 2025. Defendants  
19 appeal the denial of qualified immunity and all claims inextricably entwined.

20 //

21 //

22 //

23 <sup>1</sup> Defendants Acting Sergeant Duus and Officer Drummond were dismissed from this lawsuit. Dkt. 56, p. 9-10.

1 DATED this 30th day of July, 2025.

2 ANN DAVISON  
3 Seattle City Attorney

4 By: /s/ Catherine E. Riedo  
5 Catherine E. Riedo, WSBA #50418  
6 Alexandra Nica, WSBA #58299  
7 Assistant City Attorneys

8 E-mail: Catherine.Riedo@seattle.gov  
9 E-mail: Alexandra.Nica@seattle.gov

10 Seattle City Attorney's Office  
11 701 Fifth Avenue, Suite 2050  
12 Seattle, WA 98104  
13 Phone: (206) 684-8200

14 *Attorneys for Defendants City of Seattle, Riley Caulfield;*  
15 *Younghun Kim; Seth Wagner; John Duus; and Jason*  
16 *Drummond*

## CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of July, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

<p>Jay H. Krulewitch  P.O. Box 33546  Seattle, WA 98133</p> <p><i>[Attorney for Plaintiff]</i></p>	<p>(X) CM/ECF:  jay@krulewitchlaw.com  natalie@krulewitchlaw.com</p>
<p>Mohammad "Mo" Hamoudi  Stritmatter Kessler Koehler Moore  3600 15th Avenue West, Suite 300  Seattle, WA 98119</p> <p><i>[Attorney for Plaintiff]</i></p>	<p>(X) CM/ECF:  mo@stritmatter.com</p>

*/s/ Laura Sanabria*  
Laura Sanabria, Legal Assistant

**UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF Western Washington**

**Form 1. Notice of Appeal from a Judgment or Order of a  
United States District Court**

U.S. District Court case number: **2:23-cv-01609-RAJ**

Notice is hereby given that the appellant(s) listed below hereby appeal(s) to the United States Court of Appeals for the Ninth Circuit.

Date case was first filed in U.S. District Court: **10/19/2023**

Date of judgment or order you are appealing: **July 1, 2025**

Docket entry number of judgment or order you are appealing: **56**

Fee paid for appeal? (*appeal fees are paid at the U.S. District Court*)

Yes     No     IFP was granted by U.S. District Court

**List all Appellants** (*List each party filing the appeal. Do not use "et al." or other abbreviations.*)

**City of Seattle, Riley Caulfield, Younghun Kim, and Seth Wagner**

Is this a cross-appeal?  Yes     No

If yes, what is the first appeal case number?

Was there a previous appeal in this case?  Yes     No

If yes, what is the prior appeal case number?

Your mailing address (if pro se):

[Redacted Address Lines]

[Redacted Address Lines]

City: **[Redacted]** State: **[Redacted]** Zip Code: **[Redacted]**

Prisoner Inmate or A Number (if applicable): **[Redacted]**

**Signature** **/s/ Catherine E. Riedo**

**Date** **7/30/2025**

*Complete and file with the attached representation statement in the U.S. District Court*

*Feedback or questions about this form? Email us at [forms@ca9.uscourts.gov](mailto:forms@ca9.uscourts.gov)*

**UNITED STATES COURT OF APPEALS  
FOR THE NINTH CIRCUIT**

**Form 6. Representation Statement**

*Instructions for this form: <http://www.ca9.uscourts.gov/forms/form06instructions.pdf>*

**Appellant(s)** (*List each party filing the appeal, do not use “et al.” or other abbreviations.*)

Name(s) of party/parties:

City of Seattle, Riley Caulfield, Younghun Kim, and Seth Wagner

Name(s) of counsel (if any):

Catherine E. Riedo, WSBA #50418

Alexandra Nica, WSBA #58299

Address: 701 Fifth Avenue, Suite 2050, Seattle, WA 98104

Telephone number(s): 206-684-7782

Email(s): Catherine.Riedo@seattle.gov, Alexandra.Nica@seattle.gov

Is counsel registered for Electronic Filing in the 9th Circuit?  Yes  No

**Appellee(s)** (*List only the names of parties and counsel who will oppose you on appeal. List separately represented parties separately.*)

Name(s) of party/parties:

Elisabeth Rehn

Name(s) of counsel (if any):

Jay H. Krulewitch

Address: P.O. Box 33546, Seattle, WA 98133

Telephone number(s): (206) 233-0828

Email(s): jay@krulewitchlaw.com, natalie@krulewitchlaw.com

*To list additional parties and/or counsel, use next page.*

*Feedback or questions about this form? Email us at [forms@ca9.uscourts.gov](mailto:forms@ca9.uscourts.gov)*

Continued list of parties and counsel: (*attach additional pages as necessary*)

**Appellants**

Name(s) of party/parties:

Name(s) of counsel (if any):

Address:

Telephone number(s):

Email(s):

Is counsel registered for Electronic Filing in the 9th Circuit?  Yes  No

**Appellees**

Name(s) of party/parties:

Name(s) of counsel (if any):

Address:

Telephone number(s):

Email(s):

Name(s) of party/parties:

Name(s) of counsel (if any):

Address: 3600 15th Avenue West, Suite 300, Seattle, WA 98119

Telephone number(s): 206.448.1777

Email(s): mo@stritmatter.com